

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to: 18-cv-04890.

MASTER DOCKET

18-md-2865 (LAK)

**STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY DISMISSAL**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Skatteforvaltningen (“SKAT”) and Defendants The M2F Wellness LLC 401K Plan (“M2F Plan”) and Mitchell Protass (“Protass”) hereby stipulate and agree that SKAT’s action against Defendants M2F Plan and Protass, captioned *Skatteforvaltningen v. The M2F Wellness LLC 401K Plan, et al.*, No. 18-cv-04890, which is part of these consolidated proceedings, is hereby voluntarily dismissed by SKAT, without prejudice, with each party bearing its own costs and attorneys’ fees.

Dated: New York, New York  
December 4, 2023

By: /s/ Marc A. Weinstein  
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*Counsel for The M2F Wellness LLC 401K Plan  
and Mitchell Protass*

SO ORDERED:

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Lewis A. Kaplan  
United States District Judge